

EXHIBIT 1

1 affiliate member category.

2 Q. Teva?

3 A. I believe so.

4 Q. Endo?

5 A. I believe so.

6 Q. Okay. The HDA doesn't act
7 on it -- on its own, it acts in the
8 interest of its members and on behalf of
9 its members, correct?

10 MR. WEINSTEIN: Objection.
11 Objection to form.

12 Go ahead. You've just got
13 to give me a moment to object.

14 THE WITNESS: Sorry, I'm
15 sorry, I apologize.

16 We act on behalf of our core
17 members which are the distributor
18 members.

19 BY MR. PIFKO:

20 Q. Okay. You have a board,
21 correct?

22 A. We do.

23 Q. The board membership always
24 includes members from the big three,

1 AmerisourceBergen, McKesson, and Cardinal
2 Health, correct?

3 A. In addition to the 29 other
4 members, yes.

5 Q. Okay. But the board always
6 has somebody from those companies on it?

7 A. That's correct.

8 Q. And then there's an
9 executive committee as well, correct?

10 A. That is correct.

11 Q. And what's the makeup of the
12 executive committee?

13 A. The --

14 MR. WEINSTEIN: Objection to
15 form.

16 THE WITNESS: The executive
17 committee is seven members, three
18 members from the big three,
19 AmerisourceBergen, McKesson, and
20 Cardinal have a standing position
21 on the executive committee.

22 And then there are four
23 other positions that are other
24 member companies that filter

1 A. I believe so, yes.

2 Q. And can you describe what it
3 means to be an affiliate member?

4 A. So affiliate members at HDA
5 are manufacturers who our member
6 companies are trading partners with.
7 They are not afforded the same membership
8 status as the core members who are the
9 distributor members. They are not
10 allowed to participate in committees.
11 They can't be on the board. They are
12 welcome to participate in HDA meetings
13 and external events if they register for
14 those. But as far as communication
15 internal, particularly in government
16 affairs, we deal strictly with the HDA
17 core members.

18 Q. Plaintiff's counsel today
19 often used the term "HDA members." And I
20 just want to clarify how you understand
21 that term.

22 Unless counsel specifically
23 referred to manufacturers, did you
24 understand the term "members" to mean

1 convene interaction. We just do an
2 update twice a year.

3 Q. Did Purdue or any other
4 manufacturer ever serve on the regulatory
5 affairs committee?

6 A. No.

7 Q. And I believe you testified
8 earlier that the -- the regulatory
9 affairs committee created the -- HDA's
10 industry compliance guidelines; is that
11 correct?

12 A. That's -- that's correct.

13 Q. The industry compliance
14 guidelines are guidelines for
15 distributors; is that right?

16 A. That's correct.

17 Q. They are not meant to be
18 implemented by manufacturers?

19 A. That is correct.

20 Q. You briefly testified about
21 the drug diversion DEA strategy task
22 force. Do you recall that?

23 A. I do.

24 Q. Did manufacturer members

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ACKNOWLEDGMENT OF DEPONENT

I, Patrick Kelly, do
hereby certify that I have read the
foregoing pages, 1 - 448, and that the
same is a correct transcription of the
answers given by me to the questions
therein propounded, except for the
corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

Patrick Kelly

PATRICK KELLY

6/11/19

DATE

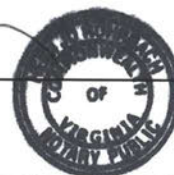
Subscribed and sworn
to before me this

11 day of June, 2019.

My commission expires: June 30, 2022

Heidi J. Rohrbaach

Notary Public



Heidi J. Rohrbaach
NOTARY PUBLIC
Commonwealth of Virginia
Reg. #7775910
My Commission Expires
June 30, 2022